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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
LEED ENVIRONMENTAL, INC.**

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December 10, 1999

Telecopy and First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Voluntary Progress Report 7 (November 1999)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during November 1999.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During November 1999, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), continued to perform remedial activities related to remediation of residential lots and remote fill areas. Major tasks performed by ENTACT included soil sampling and analysis activities and remediation of 30 residential lots and 4 remote fill lots. The residential lots and remote fill lots which were remediated in November 1999 are summarized on Table 1 and Table 2, respectively. Through November 1999, ENTACT has completed remedial activities at 730 residential properties and 26 remote fill properties. ENTACT also completed paving of the Venice Township and Eagle Park Acres alleys.
- During November 1999, ENTACT also continued with efforts related to remediation of the Taracorp pile. Major tasks performed by ENTACT included: (1) continuation of backfill of screened residential soils on the industrial site; (2) seeding and placement of turf reinforcement on the cover of the Taracorp pile; (3) installation of concrete channels; (4) installation of the storm water sewer system; (5) site surveying; and (6) related activities.



- On November 1, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers ("ACOE"), ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on November 5, 1999 to document the results of the meeting.
- On November 5, 1999, ENTACT provided a letter to EPA to document changes to ENTACT's project management team at the site.
- On November 8, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on November 9, 1999 to document the results of the meeting.
- On November 10, 1999, the Group's project coordinator issued a voluntary progress report to EPA.
- On November 10, 1999, ENTACT personnel met with Mr. Scott Oney and Mr. Brad Harris, State Street Warehouse, to discuss the remaining tasks required to be completed at the State Street Warehouse. ENTACT documented those items in a letter issued to Messrs. Oney and Harris on November 11, 1999.
- On November 15, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on November 19, 1999 to document the results of the meeting.
- On November 29, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, and ENTACT. ENTACT issued a report to project participants on December 3, 1999 to document the results of the meeting.
- During November 1999, ARCADIS personnel and representatives of the Group continued project planning efforts associated with the implementation of the pre-design investigation for groundwater. The Group continued efforts to identify property owners, to prepare access agreements, and other activities to secure access to properties for installation of groundwater monitoring wells.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Data from soil sampling activities performed by ENTACT during November 1999 in residential lots and remote fill areas have previously been provided by ENTACT personnel to EPA and have been used as the basis for defining soil excavation depths.
- Data collected from monitoring performed at the industrial site are maintained by ENTACT personnel and are available for inspection by EPA and ACOE personnel at the site.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:

- Not applicable for this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- ARCADIS personnel will continue to prepare for field activities associated with the pre-design investigation for groundwater and will initiate efforts to address EPA's comments on the Pre-Design Investigation Work Plan for Groundwater. The Group will continue efforts to secure access to appropriate properties for installation of monitoring wells. The Group will advise EPA at a later date with a schedule for initiation of the pre-design investigation for groundwater.
- During December 1999, ENTACT will continue excavation and restoration of residential lots and remote fill lots. Residential and remote fill lots to be addressed by ENTACT personnel during December 1999 will be coordinated on a daily basis with ACOE representatives and will be discussed with EPA during weekly progress meetings. Weather permitting, ENTACT anticipates that remedial activities associated with the residential lot and remote fill lot remediation, except for Slough Road, will be substantially complete in December 1999. ENTACT also anticipates that street vacuuming will be performed. ENTACT and the Group will continue efforts to resolve issues with EPA related to the scope of work at Slough Road.
- During December 1999, ENTACT will also continue activities associated with remediation of the Taracorp pile. Weather permitting, ENTACT anticipates that remedial activities associated with the Taracorp pile will be substantially complete by the end of December 1999.

- A pre-final inspection has been scheduled with EPA at the site on December 15, 1999. Following the inspection, ENTACT anticipates that remaining tasks will be completed and that personnel and equipment will be demobilized from the site.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As noted in the October 1999 progress report, Group representatives and ENTACT personnel learned of several potential issues with the adjacent property owners at the State Street Warehouse and the Rich Oil Company. Representatives of the Group and ENTACT will continue efforts to resolve these issues.
- As noted above, the Group and ENTACT personnel will continue efforts to resolve issues related to the scope of work at Slough Road.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

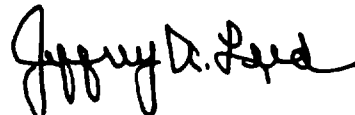
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period. Unless requested by EPA, no community relations activities are currently planned to be performed by the Group during the next six-week period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachment

cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller (w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1
RESIDENTIAL LOTS

Weekly Progress Report - Activities Through 11/15/99

	Lot #	Street	Depth	Notes	Soil Removal	Backfill	Stone
701	1652	Poplar	3		11/5/1999	11/5/1999	11/5/1999
704	2000	Edison	6	3 lots	11/9/1999	11/9/1999	11/9/1999
705	2456	Benton	3		11/10/1999	11/11/1999	11/11/1999
706	2455	Cleveland	12		11/11/1999	11/11/1999	11/11/1999
707	2059	Cleveland	6		11/12/1999	11/12/1999	11/12/1999
708	2037	Delmar	3		11/12/1999	11/12/1999	11/12/1999
709	2300	Edison	6		11/15/1999	11/15/1999	11/15/1999

Weekly Progress Report - Activities Through 11/30/99

	Lot #	Street	Depth	Notes	Soil Removal	Backfill	Stone
710	2318	Edison	3		11/16/1999	11/20/1999	11/20/1999
711	2322	Edison	6		11/16/1999	11/20/1999	11/20/1999
713	838	Niedringhaus	12	2 lots	11/17/1999	11/26/1999	11/26/1999
714	2617	Cayuga	3		11/18/1999	11/19/1999	11/19/1999
716	2235	Ohio	6	2 lots	11/18/1999	11/22/1999	11/22/1999
717	2222	Illinois	12		11/19/1999	11/20/1999	11/20/1999
718	2828	W. 20th	12		11/19/1999	11/22/1999	11/22/1999
720	2224/26	Missouri	3	2 lots	11/22/1999	11/22/1999	11/22/1999
721	2211	Lee	6		11/23/1999	11/26/1999	11/26/1999
722	2002	Missouri	12		11/24/1999	11/24/1999	11/24/1999
725	926	Alton	3	3 lots	11/23/1999	11/24/1999	11/24/1999
726	2015	12th	12		11/29/1999	11/29/1999	11/29/1999
727	1647	Olive	12		11/29/1999		
730	1918	Edwardsville	6	3 lots	11/30/1999	11/30/1999	11/30/1999

TABLE 2
REMOTE FILL LOTS

Progress Report - Activities Through 11/15/99

	Lot #	Street	Soil Removal	Backfill	Stone
23	205	Allen	11/1/1999	11/3/1999	11/3/1999
24	1206	College	11/2/1999	11/3/1999	11/3/1999
25	1231	Robin	11/4/1999	11/4/1999	11/4/1999
26	1237	Robin	11/4/1999	11/4/1999	11/4/1999